



# THE PACIFIC FOREST TRUST

*Our Private Forests are Our Public Treasures.*

October 17<sup>th</sup>, 2007

## **Re: Initial Comments for the Lifecycle Analysis Workgroup**

*Submitted via email to Anil Prabhu at [aprabhu@arb.ca.gov](mailto:aprabhu@arb.ca.gov)*

The Pacific Forest Trust (PFT) appreciates the opportunity to submit initial comments to the Lifecycle Analysis Workgroup regarding the Low Carbon Fuel Standard (LCFS), and issues related to the forest sector. PFT is a collaborative, problem-solving organization that works with diverse partners to help sustain forestland for its wealth of public benefits, including climate benefits. Since its inception, PFT has led the development of projects and policies to achieve substantial benefits for the climate through the sustainable stewardship and conservation of productive, working forests.

Forests are an important part of the state's climate goals and require increased attention if they are going to be effectively incorporated into AB 32 implementation strategies. The LCFS is a promising step toward this goal, and we would like to submit the following comments for further consideration. PFT would also like to offer our experience and assistance as a stakeholder and member of the Lifecycle Analysis Workgroup in developing these ideas in future meetings and public workshops.

### **Issues to Flag for Further Discussion**

*1) Lifecycle accounting should reflect the full climate impact of biofuels production, including emissions from the land base.*

In order to acknowledge the full climate impact of biofuels, all the emissions associated with biofuels must be accounted for, including those from the land base. Emissions from the land base typically come from two sources: 1) conversion of existing natural lands to biofuel crops, and 2) changes in management practices in order to harvest more biomass for the production of biofuels (e.g., thinning forests in order to produce cellulosic ethanol).

Although we recognize that cellulosic ethanol is not yet ready for wide-scale use, we believe this technology will have an important role to play in the next few years. Therefore, any system for lifecycle accounting should anticipate and be able to accommodate emissions measurement and reporting for cellulosic ethanol.

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*2) To certify that biofuels are actually beneficial for the climate, there must be standardized, regulatory and mandatory reporting of lifecycle emissions.*

A standardized set of protocols for quantifying, tracking, reporting and verifying lifecycle emissions and emissions reductions from biofuels should be established to certify that these biofuels are indeed “carbon-neutral,” meaning that any and all emissions associated with harvest, production, transportation and combustion of those fuels are accounted and compensated for.

California could also go beyond “climate-neutral” by promoting biofuels from forests that are actually sequestering and storing more CO<sub>2</sub> from the atmosphere than is needed to purely compensate for emissions (i.e. are “climate-negative”). The state could do this through a variety of regulatory and incentive-based mechanisms.

*3) The Congressional Budget Office emphasizes the economic importance of lifecycle accounting.*

A September 2007 Congressional Budget Office paper entitled, “The Potential for Carbon Sequestration in the United States,” emphasizes that full lifecycle accounting for emissions from biofuels is important not only from an environmental perspective but also from an economic perspective. If emissions from biofuels are not completely accounted for, cost estimates of forest-based activities could unfairly bias biofuels without taking into account the negative impacts of deforestation and depletion. The report also notes that when models do not apply CO<sub>2</sub> price changes to biological stocks of carbon, biofuel production increases at the expense of other forest strategies that directly increase carbon sequestration or avoid emissions on the forestland base. Thus, policies that only focus on emissions reductions from an energy perspective could lead to unintended consequences for the forestland base.

*4) Lifecycle accounting must be tailored to include biofuels from managed forestlands.*

One segment of the forestland base that will be especially impacted by a LCFS (especially once cellulosic ethanol becomes more widespread) is private, working forestland from which biomass can be readily harvested. Therefore, policies and methodologies for accounting depletion should be tailored to these managed lands and towards preventing perverse or harmful changes in forest management. One option



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would be to rely on the existing Forest Project Protocols developed by the California Climate Action Registry for quantifying changes in carbon stocks, and thus emissions, from forest management activities. This could be a simple yet effective prerequisite for forest-based biofuels to qualify for the LCFS.

*5) The climate benefits of the LCFS should not come at the expense of other important environmental benefits.*

The LCFS should incorporate standards and policies to avoid conversion of native, productive ecosystems and protect overall environmental integrity. Therefore, separate, rigorous environmental standards and parameters are needed to protect ecosystems, habitat, wildlife, biodiversity, water quality, recreational opportunities and aesthetic value, among other significant benefits.

Thank you again for the opportunity to provide input at this early stage of LCFS development. We appreciate the tremendous effort on the part of the Workgroup to consider the input of stakeholders and the public, and sincerely hope that these initial comments are useful. If you have any questions, please do not hesitate to contact us. We look forward to continuing to work with you as a stakeholder and member of the Lifecycle Analysis Workgroup on these issues going forward.

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